

**EPA Reg. No. 87290-59**  
**Vol. 2**

# PROCESSING REQUEST

Reg # 87290-59

Decision # 514217, 513660

Description:

Electronic Label & Letter  
(see PPLS):

OR

Non Electronic  
Label & Letter  
(Scanning required):

☐ Dated:

☐ Dated:

\*\*\*Only one label type should be selected\*\*\*

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 12/21/15 and 1/27/16

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Dominic Schuler

Division: RD/HB

Phone: 7033470260

Date:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 2, 2016

Willowood Sulfentrazone LLC  
c/o Cheryl Wagner  
Wagner Regulatory Associates  
PO Box 640  
7217 Lancaster Pike, Suite A  
Hockessin, DE 19707

Subject: CSF Amendment and Notification – Add Alternate CSF 1 and 2  
Product Name: WILLOWOOD SULFENTRAZONE 4SC  
EPA Registration Number: 87290-59  
Application Date: 12/21/15; 1/27/16  
Decision Number: 514217; 513660

Dear Ms. Wagner:

The Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 11/18/215
- Alternate CSF 1 dated 12/21/15
- Alternate CSF 2 dated 1/27/16

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, you may contact Dominic Schuler at 703-347-0260 or via email at [schuler.dominic@epa.gov](mailto:schuler.dominic@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Kathryn V. Montague".

Kathryn Montague, Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Via E-Submission

January 27, 2016

Document Processing Desk (NOTIF)  
ATTN: Kathryn Montague (PM 23)  
Registration Division (7505P)  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
One Potomac Yard  
2777 South Crystal Drive  
Arlington, Virginia 22202

**Re: Willowood Sulfentrazone 4SC, EPA Reg. No. 87290-59; Alt. #2 CSF**

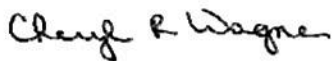
Dear Ms. Montague:

Wagner Regulatory Associates, Inc., as agent for Willowood LLC, is submitting a notification of an Alt. 2 CSF that includes an alternate registered source of TGAI. In support of this request, the following documents:

- Letter from RedEagle International LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Formulator Exemption (8570-27)
- Confidential Statement of Formula (8570-4)

If you have any questions about this submission please contact the undersigned at (302) 635-7289 or [cheryl@wagnerreg.com](mailto:cheryl@wagnerreg.com).

Respectfully submitted,



Cheryl Wagner  
Agent for Willowood LLC  
Enclosures

DOCUMENTUM



## Willowood Sulfentrazone, LLC.

1600 NW Garden Valley Boulevard, Suite 120, Roseburg, Oregon 97471

Tel: 541-679-9963 Fax: 541-679-4650 [www.willowoodusa.com](http://www.willowoodusa.com)

---

December 22, 2014

To: Whom it May Concern

RE: Designation of Agent for:  
**Willowood Sulfentrazone, LLC**  
1600 NW Garden Valley Blvd Suite 120  
Roseburg, Oregon 97471

Dear Sir or Madam:

This letter serves as notification that Willowood Sulfentrazone, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Willowood Sulfentrazone, LLC will register with US EPA and the states. Please forward all correspondence for our company and its products to:

Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to call me if you have any questions.

Respectfully submitted,

Brian Heinze  
President/CEO  
Willowood USA

cc: WRA, Inc.

---

**DOCUMENTUM**





United States  
Environmental Protection Agency  
Washington, DC 20460

Registration

OPP Identifier Number

Amendment

Other

**Application for Pesticide - Section I**

1. Company/Product Number 87290-59	2. EPA Product Manager Kathryn Montague	3. Proposed Classification  <input checked="" type="checkbox"/> None      Restricted
4. Company/Product (Name) Willowood, LLC / Willowood Sulfentrazone 4SC	PM# 23	
5. Name and Address of Applicant (Include Zip Code)  Willowood, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707  <input type="checkbox"/> Check if this is a new address		6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No.  Product Name:

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application. (100% Repack)
<input checked="" type="checkbox"/> Notification - Explain below. Add Alt. 2 CSF - Alt.Reg. Source of Tech.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III****1. Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes"      No. per Unit Packaging wgt.      container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes"      No. per Package wgt.      container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
--	---	---	---

\* Certification must be submitted

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 30, 265 gallon	5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product
---	---	--

6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	<input type="checkbox"/> Other _____
--	--------------------------------------

**Section - IV****1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name James M. Wagner	Title Agent for Willowood, LLC	Telephone No. (Include Area Code) (302) 635 7290
-------------------------	-----------------------------------	---

**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Agent for Willowood, LLC
4. Typed Name James M. Wagner	5. Date January 27, 2016

Date Application Received

(Stamped)

DOCUMENTUM



United States  
**Environmental Protection Agency**  
 Washington, DC 20460  
**Formulator's Exemption Statement**  
*(40 CFR 152.85)*

Applicant's Name and Address  Willowood, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">EPA File Symbol/Registration Number <b>87290-59</b></td> </tr> <tr> <td style="padding: 5px;">Product Name <b>Willowood Sulfentrazone 4SC</b></td> </tr> <tr> <td style="padding: 5px;">Date of Confidential Statement of Formula (EPA Form 8570-4) <b>01/27/2016</b></td> </tr> </table>	EPA File Symbol/Registration Number <b>87290-59</b>	Product Name <b>Willowood Sulfentrazone 4SC</b>	Date of Confidential Statement of Formula (EPA Form 8570-4) <b>01/27/2016</b>
EPA File Symbol/Registration Number <b>87290-59</b>				
Product Name <b>Willowood Sulfentrazone 4SC</b>				
Date of Confidential Statement of Formula (EPA Form 8570-4) <b>01/27/2016</b>				

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Sulfentrazone

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

**Source**

Active Ingredient	Product Name	Registration Number
Sulfentrazone	<div style="background-color: black; width: 100%; height: 60px;"></div>	<div style="background-color: black; width: 100%; height: 60px;"></div>

**\*Product ingredient source information may be entitled to confidential treatment\***

Signature	Name and Title James M. Wagner, Agent	Date 01/27/2016
-----------	--	--------------------

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA  
Copy 2 - Applicant copy

DOCUMENTUM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

December 28, 2015

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

MS. CHERYL WAGNER  
WAGNER REGULATORY ASSOCIATES, INC.  
WILLOWOOD, LLC  
PO Box 640  
HOCKESSIN, DE 19707-0640

PRODUCT NAME: Willowood Sulfentrazone 4SC  
COMPANY NAME: WILLOWOOD, LLC  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 87290-59  
EPA RECEIPT DATE: 12/21/15

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 23, at (703) 305-1243.

Sincerely,

A handwritten signature in black ink, appearing to be "S. [unclear]", is written over the word "Sincerely,".

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

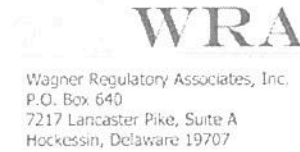




Electronic Submission

December 21, 2015

Document Processing Desk (AMEND)  
ATTN: Kathryn Montague (PM23)  
Registration Division (7504P)  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
One Potomac Yard  
2777 South Crystal Drive  
Arlington, Virginia 22202



Dear Ms. Montague,

**Re: Willowood Sulfentrazone 4SC, Reg. No. 87290-59, Alternate CSF #1**

Wagner Regulatory Associates, Inc., as agent for Willowood, LLC, is requesting approval of Alternate Formulation #1 CSF, copy attached. The alternate ingredients in this formula are not likely to change the acute toxicity of this product compared to the current basic CSF dated March 24, 2015. A rationale to support this conclusion is included with this submission for EPA's consideration.

In support of this request the following documents are enclosed:

- Letter from Willowood, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- CSF (8570-4) - Alt #1 dated 21 December 2015
- CSF (8570-4) - Basic dated 24 March 2015
- Supporting Rationale
- Safety Data Sheet for each inert ingredient
- Formulator's Exemption Statement (8570-27)

If you have any questions about this submission please contact the undersigned by telephone or by email as noted below.

Respectfully submitted,

A handwritten signature in black ink, reading 'James M. Wagner', is written over a horizontal line.

James M. Wagner  
Agent for Willowood, LLC  
Tel: (302) 635-7290  
Email: james@wagnerreg.com

Enclosures

**DOCUMENTUM**



United States  
**Environmental Protection Agency**  
 Washington, DC 20460  
**Formulator's Exemption Statement**  
*(40 CFR 152.85)*

Applicant's Name and Address  Willowood, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	EPA File Symbol/Registration Number 87290-59  Product Name Willowood Sulfentrazone 4SC  Date of Confidential Statement of Formula (EPA Form 8570-4) 12/21/2015
---	---

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

Sulfentrazone

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

- (3) Indicate by checking (A) or (B) below which paragraph applies:

- ☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- ☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Sulfentrazone	[REDACTED]	[REDACTED]
<p>*Product ingredient source information may be entitled to confidential treatment*</p>		
Signature	Name and Title James M. Wagner, Agent	Date 12/21/2015

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA  
Copy 2 - Applicant copy

